UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re
ADLEBI, INC.
Putative Debtor.

Chapter 11
Involuntary Case
Case No. 16-12256 (MEW)

Notice of Motion
For To Be
Relieved Pursuant
To 28 U.S.C. §157
And For Extensions of
Deadlines Pursuant
To Fed, R, Civ. R.
6 (b) (1)

Please, take notice upon the annexed declaration of Gerald Slotnik dated January 29, 2017, and annexed exhibit and all prior pleadings, proceedings and orders heretofore had herein, the undersigned will move this Court pursuant to 28 U.S.C. §157 relieving Gerald Slotnik as debtor's counsel and pursuant to Fed. R. Civ. P. 6 (b) (1) extending debtor's filing deadlines at a hearing to be held at the United States Bankruptcy Court, One Bowling Green, New York, NY 1004-1408. Court room 617 (Wiles, J) on the 14th Day of February, 2017 at 10:00 a.m. or as soon thereafter as counsel can be heard

Please, take further notice that pursuant to the Federal Rules of Civil Procedure and the local rules of this Court written objections must be received by the undersigned by February 6, 2017 at 4:00 p.m.

1/29/17

Gerald Slotnik (GS – 8924)
Attorney for Debtor
1833 East 12th Street
Apt. 6L
Brooklyn, NY 11229
(718) 375 6615

To:
Adlebi Inc
1732 1st Avenue
#28263
New York, NY 10128

Yehuda Nelkernbaum
1759 East 10th Street
Brooklyn, NY 11233

Unites States Trustee
Office of the United States Trustee
U.S. Federal Office Building
201 Varick Street. Room 1006
New York, NY 10014
Attn: Susan Arbeit

PHILLIPS LYTLE LLP
Nickolas Karavolas, Esq. (NK2504)
Attorneys for the Trusts
The New York Times Building
620 Eight Avenue, 23rd Floor
New York, NY 10018

FILED
U.S. BANKRUPTCY COURT
S.D. OF N.Y.
2017 FEB -6 P 1:42

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re
ADLEBI, INC
Putative Debtor,

Chapter 11
Involuntary Case

Case No. 16-12256 (MEW)

Declaration

Gerald Slotnik, an attorney admitted to practice in the Courts of the State of New York and this Court hereby declares under penalties of perjury:

(1) I am the attorney of record for debtor Adlebi, Inc. ("debtor" or "Adlebi").

(2) I am submitting this declaration in support of my motion to be relieved as counsel pursuant to 28 USC §157 and for an order pursuant to Fed. R. Civ. P. 6 (b) (1) extending the debtor's time to comply with this Court's order for relief dated January 19, 2017, the U.S. Trustee's request for inter alia, schedules and, the Tax Lien Trusts' motion for relief from the automatic stay pursuant to Section 362 (D) of the Bankruptcy Law.

(3) On August 2, 2016, Yehuda Nelkenbaum (the "Petitioning Creditor") filed a chapter 11 involuntary petition (the "Involuntary Petition") in this Court seeking an order for relief to be entered against Adlebi, Inc. under title 11 of the United States Code.

(4) On August 3, 2016, a summons was issued to the debtor, directing the submission of a motion or answer to the Involuntary Petition within 21 days after service of the summons.

(5) On August 31, 2016, an affidavit of service was filed on the docket reflecting that service of the Summons to Debtor in Involuntary Case and Involuntary Chapter 11 Bankruptcy Petition had been made on August 30, 2016 by serving the authorized agent in the Office of the Secretary of State of the State of New York, pursuant to section 306 of the N.Y. Business Corporation Law.

(6) A hearing on an Order to show cause, dated November 14, 2016, was held on November 30, 2016 at which I appeared asking for an extension of time to answer because service had been made on the Secretary of State and notice had not been received until after the deadline.

(7) An order approving the late filing of the answer was entered on December 16, 2016.

(8) On the same day, an answer was filed contesting entry of the order for relief, and with the consent of all parties, a hearing on the involuntary petition was scheduled for January 10, 2017.

(9) At the hearing on January 10, 2017 I stated that Adlebi consented to the entry of an order for relief.

(10) Based upon the foregoing, this Court entered an order for relief on January 19, 2017, directing inter alia, that the debtor file all schedules, statements, list of creditors, within 14 days of date of entry of the order (2.2.2017).

(11) Counsel for the Tax Lien Trust served its motion for relief from the automatic stay on or about 1.18.17.

(12) On or about 1.25.2017 I received the U.S. Trustee's request for schedules, etc.

(13) By letter dated 1/29/2017 (Exhibit "1" hereto) I advised the debtor's principal, Eli Kass, that I required his cooperation to comply with the Court's 1.19.17 order, the Trustee's requests and to respond to the Tax Lien Trust's motion to vacate the statutory stay. I annexed this motion, the Lien Trust's motion, the U.S. Trustee's requests, and another copy of this Court's 1.19.17 orders (Exhibit "2").

(14) Unfortunately, since 1/10/2017 counsel has not received any communications from the debtor which made it impossible for me to comply with this Court's order for relief dated 1.19.17, the U.S. Trustee's request and respond to the Tax Lien Trust's motion to vacate the bankruptcy stay.

(15) Accordingly, I am requesting that this Court relieve me as counsel since I have no cooperation from my client.

(16) I am requesting an extension of time for the debtor to respond to Court's order, U.S. Trustee's requests and the Tax Lien Trust's motion to protect its interests.

(17) Given the lengthy litigation background of this case (see Tax Lien Trust's motion I do not believe that a modest extension (30 days) of the applicable deadlines would projudica any party. An extension would allow debtor to obtain new counsel if it so decides, and respond to the document demands and motion.

Wherefore, counsel for the debtor respectfully requests that his motion to be relieved and for an extension of debtor's deadlines be granted.

Dated:

Brooklyn, New York

January 29, 2017

Gerald Slotnik

(GS-8924)

Gerald Slotnik
1833 East 12th Street, Apt. 6l,
Brooklyn, NY 11229

January 29, 2017

Mr. Eli Kass
c/o Adlobi, Inc.
1732 1st Avenue
#28263
New York, NY 10128

Re: Adlobi, Inc. B.C.S.D.N.Y
16-12256 (MEW)

Dear Mr. Kass,

The Court has issued an order directing us to file required schedules and Statements by February 02. 2017.

12 U.S. Trustee has its own document demands. The Lien Trust has moved to vacate the Bankruptcy Stay. All of these documents are enclosed with my motion to be relieved which I have been forced to file because you have ceased to communicate with me which precludes me from responding to the demands and motion. My motion is returnable February 14, 2017 10 a.m. at One Bowling Green, New York, NY at Rm. 617 (Wiles, J). I have also requested the Court to extend all of your applicable deadlines so that you can select alternative counsel and respond appropriately.

Please, guide yourself accordingly.

Sincerely yours,

Gerald Slotnik

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re ADLEBI, INC. Putative Debtor.	Chapter 11 Involuntary Case Case No. 16-12256 (MEW)

ORDER FOR RELIEF

On August 2, 2016, Yehuda Nelkenbaum (the "Petitioning Creditor") filed a chapter 11 involuntary petition (the "Involuntary Petition") in this Court seeking an order for relief to be entered against Adlebi, Inc. (the "Putative Debtor") under title 11 of the United State Code. On August 3, 2016, a summons was issued to the Putative Debtor, directing the submission of a motion or answer to the Involuntary Petition within 21 days after service of the summons. On August 31, 2016, an affidavit of service was filed on the docket reflecting that service of the *Summons to Debtor in Involuntary Case and Involuntary Chapter 11 Bankruptcy Petition* had been made on August 30, 2016 by serving the authorized agent in the Office of the Secretary of State of the State of New York, pursuant to section 306 of the N.Y. Business Corporation Law. A hearing on an Order to show cause, dated November 14, 2016, was held on November 30, 2016, at which the Debtor's counsel appeared asking for an extension of time to answer because service had been made on the secretary of state and notice had not been received until after the deadline. An order approving the late filing of the answer was entered on December 16, 2016. On the same date, an answer was filed contesting entry of the order for relief, and with the consent of all parties, a hearing on the involuntary petition was scheduled for January 10, 2017. At the hearing on January 10, 2017, counsel to Adlebi stated that Adlebi consented to the entry of an order for relief. Based upon the foregoing, it is hereby

ORDERED, that the request for an Order for Relief is GRANTED; and it is further

ORDERED that the Debtor shall file all schedules, statements, lists, and other documents that are required under the Federal and Local Rules of Bankruptcy Procedure within fourteen days from the date of entry of this Order.

Dated: New York, New York
January 19, 2017

s/Michael E. Wiles
UNITED STATES BANKRUPTCY JUDGE

copies mailed to:

Adlebi Inc
1732 1st Avenue
#28263
New York, NY 10128

Gerald Slotnik, Esq.
1833 E. 12th Street
Brooklyn, NY 11229

Yehuda Nelkernbaum
1759 East 10th Street
Brooklyn, NY 11233

United States Trustee
Office of the United States Trustee
U.S. Federal Office Building
201 Varick Street, Room 1006
New York, NY 10014

Hearing Date and Time: February 14, 2017 at 10:00 a.m.
Objection Deadline: February 6, 2017 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re
ADLEBI, INC
Putative Debtor,

Chapter 11
Involuntary Case

Case No. 16-12256 (MEW)

Affirmation of Service

I, Gerald Slotnik, an attorney admitted to practice in the Courts of New York State, affirms under penalties of perjury:

1. On 1/30/2017 I served the annexed notice of motion and declaration and exhibits to the undersigned parties and counsel by mailing them by U.S. mail in a Facility maintained by the United States Post Office.

To:
Adlebi Inc
1732 1st Avenue
#28263
New York, NY 10128

Yehuda Nelkernbaum
1759 East 10th Street
Brooklyn, NY 11233

Unites States Trustee
Office of the United States Trustee
U.S. Federal Office Building
201 Varick Street, Room 1006
New York, NY 10014
Attn: Susan Arbeit

PHILLIPS LYTLE LLP
Nickolas Karavolas, Esq. (NK2504)
Attorneys for the Trusts
The New York Times Building
620 Eighth Avenue, 23rd Floor
New York, NY 10018-1405

Dated:
Brooklyn, New York
1.30.2014

Gerald Slotnik